

CHAPTER 7.0

GROWTH INDUCEMENT AND SIGNIFICANT IRREVERSIBLE IMPACTS

7.1 GROWTH-INDUCING IMPACTS

Section 15126.2 of the California Environmental Quality Act (CEQA) requires a discussion of the ways in which a project may induce growth in an area. Growth-Inducement, as defined by the CEQA Guidelines, concerns consequences of a proposed project that "...could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are project which would remove obstacles to population growth..." Population growth, in turn, can tax community facilities and may require construction of new infrastructure that could cause significant environmental effects at a later time. However, growth should not be assumed to be necessarily beneficial, detrimental, or of little significance to the environment.

Typically, the growth-inducing potential of a project would have a significant impact if it either fostered growth or created a capacity to accommodate growth above and beyond levels expected in the absence of the project. Of particular concern are those projects that, when constructed, serve to remove an existing barrier to growth, such as a major upgrade to a wastewater treatment facility, construction of a new road in an undeveloped area, or the provision of sewer, water, or other utility lines with excess capacity that could accommodate substantial local development. However, the creation of growth-inducing potential does not automatically lead to growth, because growth at the local level is controlled by a variety of different influences, including economic market forces, local politics, and existing development conditions.

As discussed in Chapter 3.0, Project Description, the proposed project would be an accessory facility to an approved oil development expansion project (Phase IV) designed to increase crude oil production of the Price Canyon Unit's Arroyo Grande Oil Field, which has occurred in the project area since 1906. The proposed project itself would not specifically expand oil development activities, but rather would serve to address the production and disposal of water produced under a previously-approved expansion. In summary, the project would not introduce a new land use into the area, nor would it cause a conversion of surrounding land uses (which are primarily agricultural) to more intensive land uses.

The employment generated by the project would not induce growth in the community. PXP currently employs 30 permanent and contract employees consisting of a supervisor, an office clerk, engineers, and maintenance and operation employees. The proposed project will require six or seven new permanent employees during operation. The workers needed during the construction phase would be drawn from the San Luis Obispo area. The project would not create additional public infrastructure, (i.e. public roads), and would not extend existing utility lines, including water and sewer.

7.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL IMPACTS

Section 15126.2 of the CEQA Guidelines requires a discussion of irreversible environmental changes that would occur as a result of project implementation. According to Section

15126.2(c) of the CEQA guidelines, "...uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such consumption is justified." The RO Produced Water project would result in the following irreversible environmental changes:

- Use of nonrenewable resources in the construction of the proposed facilities;
- Long-term commitment of land for the new well pads; and,
- Greater long-term use of nonrenewable resources through the oil development operations.

The following sections describe both the direct and indirect irreversible changes that would result from project implementation, as well as the justification for the approval of such changes at this time.

7.2.1 USE OF NATURAL RESOURCES BY THE PROJECT

Project implementation would consume non-renewable resources for four main purposes:

- The mobilization of equipment, supplies, and manpower at construction sites;
- The use of natural resources as construction material for the project components;
- The consumption of resources in the course of long-term project operations and maintenance; and,
- Such use would not be wasteful and would be focused on achieving the worthwhile goal of energy production.

7.2.2 IRREVERSIBLE COMMITMENT OF LAND

The proposed project would not involve the additional irreversible commitment of land for construction of the proposed project beyond that which has previously been committed under the Phase IV project. The project will be conducted in an existing oil production area that has been in operation since 1906. Construction of tanks and other infrastructure is reversible, such that they may be abandoned and demolished after the life of the project.

7.2.3 INCREASED USE OF NON-RENEWABLE RESOURCES

If the proposed project is not implemented, current oil production rates and associated activities approved under the Phase IV expansion will be limited. The amount of non-renewable resources consumed under the Phase IV Expansion project, in addition to the currently proposed project which consists of natural gas for operation of the steam generators, is outweighed by the resources that will be developed as a result of this project. The main goal of the proposed project is to develop a disposal system for produced water generated by oil extraction, and thus increase the amount of oil that can be obtained under the approved Phase IV expansion. Therefore, the non-renewable resources demand by the proposed project itself is not considered significant.

The proposed project would indirectly increase the volume of oil and gas extracted and produced locally, but would not increase the net consumption of oil and gas. The production levels facilitated by implementation the water reclamation facility would be used to satisfy existing demand.

The proposed project could result in environmental accidents (e.g., produced water, oil and fuel spills) that have the potential to create irreversible impacts to biological resources if local populations of special-status plant and wildlife species were to be reduced below self-sustaining levels; however, a Spill Contingency Plan (see Mitigation Measure BIO-4D) has been built in to address this potential threat through the use of contingency measures. Additionally, pPotential impacts can be reduced through the use of adequate water reclamation facility design and operating procedures and effective emergency response plans specifying staffing and equipment needs. However, as the proposed project facilitates build-out of the Phase IV Expansion, the potential remains for irreversible damage as an unlikely upset associated with the operation of the proposed project.

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